

STEVEN S. ALM
United States Attorney
District of Hawaii

ELLIOT ENOKI
First Assistant U.S. Attorney

MICHAEL K. KAWAHARA
Assistant U.S. Attorney
Room 6100, Federal Building
300 Ala Moana Blvd.
Honolulu, HI 96850

Attorneys for Plaintiff
United States of America

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

SEP 27 2000
2 o'clock and 15 min
WALTER A.Y.H. CHINN, CLERK

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

CR00-00392 SOM

UNITED STATES OF AMERICA,)	CR. NO. _____-01,-02
)	
Plaintiff,)	INDICTMENT
)	[21 U.S.C. 846, 841(a)(1)]
vs.)	
)	
JONATHAN L. ALEXANDER, (01))	
SCOTT KATSUKI SHIMODA, (02))	
)	
Defendants.)	

INDICTMENT

Count 1:

The Grand Jury charges that:

From a time unknown to the Grand Jury up through and including on or about September 19, 2000 in the District of Hawaii and elsewhere, defendants:

JONATHAN L. ALEXANDER (hereinafter "Alexander"),
SCOTT KATSUKI SHIMODA (hereinafter "Shimoda"),

and others unknown to the Grand Jury knowingly and intentionally conspired to distribute and to possess with intent to distribute five-hundred grams or more of a mixture or substance containing a

detectable amount of cocaine, its salts, optical and geometric isomers, and salts of its isomers, a Schedule II narcotic controlled substance,

A violation of Title 21, United States Code, Section 841(a) (1).

Overt Acts:

In furtherance of this conspiracy and in order to attain the objects thereof, the following overt acts, among others, were committed in the District of Hawaii and elsewhere:

1. On or about September 12, 2000, Alexander tendered for delivery the following parcel at the post office at the Los Angeles International Airport, California:

One (1) Express Mail parcel bearing mailing label #EK181822086US, and addressed to Russell Ho, Suite 106, 350 Ward Avenue, Honolulu, Hi 96814, Box #125 (hereinafter "Parcel #1").

2. On or about September 12, 2000, Alexander tendered for delivery the following parcel at the post office at the Los Angeles International Airport, California:

One (1) Express Mail parcel with mailing label #EK181822090US, and addressed to Russell Ho, Suite 106, 350 Ward Avenue, Honolulu, Hi 96814, Box #125 (hereinafter "Parcel #2").

3. On or about September 19, 2000, Shimoda picked up Parcel #1 from the post office at the Honolulu International Airport, Hawaii.

4. On or about September 19, 2000 in Honolulu, Hawaii, Shimoda met with Alexander.

5. On or about September 19, 2000 in Honolulu, Hawaii,

Shimoda placed Parcel #1 in a Ford pickup truck.

All in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(B).

Count 2:

The Grand Jury further charges that:

On or about September 19, 2000, in the District of Hawaii,
defendants:

**JONATHAN L. ALEXANDER and
SCOTT KATSUKI SHIMODA**

knowingly and intentionally attempted to possess with intent to distribute five-hundred grams or more of a mixture or substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of its isomers, a Schedule II narcotic controlled substance,

In violation of Title 21, United States Code, Sections 846,

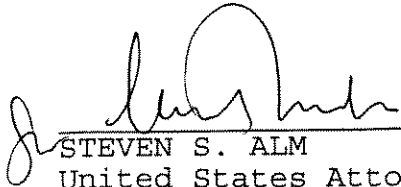
841(a)(1), and 841(b)(1)(B).

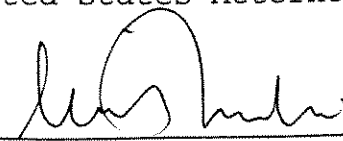
DATED: Honolulu, Hawaii, September 27, 2000.


A TRUE BILL,

151

GRAND JURY FOREPERSON


STEVEN S. ALM
United States Attorney


ELLIOT ENOKI
First Assistant U.S. Attorney


MICHAEL K. KAWAHARA
Assistant U.S. Attorney

USA v. Alexander et. al., USDC-Hawaii, Indictment.